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Diese Unterlage wurde von einem Mitarbeiter des DRSC für die FA-Sitzung erstellt.

IFRS-FA – öffentliche Sitzungsunterlage

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| Sitzung: | 07. IFRS-FA / 27.07.2012 / 10:30 – 11:00 Uhr |
| TOP: | 05 – Neue Themen zur Interpretation der IFRS |
| Thema: | Stellungnahme an das IFRS Interpretations Committee zur vorläufigen Entscheidung vom Mai 2012: Accounting for <i>Contribution Based Promises</i> - Impact of the 2011 amendments to IAS 19 |
| Papier: | 07_05a_IFRS-FA_Interpret_CBP |

Hintergrund

- 1 Im IFRIC Update vom Mai 2012 wurde die vorläufige Agendaentscheidung zu dem Thema **IAS 19 Employee Benefits—Accounting for contribution-based promises - Impact of the 2011 amendments to IAS 19** veröffentlicht:

The Committee received a request seeking clarification about the accounting in accordance with IAS 19 (2011) for contribution-based promises. An underlying concern in the submission was whether the revisions to IAS 19 in 2011, which for example clarified the treatment of risk sharing features related to defined benefit obligations, affect the accounting for contribution-based promises.

The Committee noted that the 2011 amendments to IAS 19 that clarified the treatment of risk-sharing features address arrangements in which the cost of a pension promise is shared between the employee and the employer. It did not intend to address elements specific to contribution-based promises. Accordingly, the Committee does not expect the 2011 amendments to cause changes to the accounting for contribution-based promises, unless such promises also include elements of risk-sharing arrangements between employees and employers. The Committee also noted that the amendments in 2011 might affect how changes in contribution-based promises are presented. Finally, the Committee noted that the Board expressed, in paragraph BC148 of the revised standard, that addressing concerns about the measurement of contribution-based promises and similar promises was beyond the scope of the 2011 amendments.

On the basis of the analysis described above, the Committee [decided] not to add the issue to its agenda, it will however decide, at a future meeting, whether to address the accounting for contribution-based promises (see Committee work in progress below).

- 2 Der IFRS-Fachausschuss, der dieses Thema beim IFRSIC eingereicht hatte, beabsichtigte zunächst nicht, eine Stellungnahme zu dieser vorläufigen Agendaentscheidung einzureichen.



- 3 Nachdem jedoch in den vergangenen Wochen im Rahmen nachlaufender Diskussionen gewisse Unsicherheiten in Bezug auf die Formulierung

... unless such promises also include elements of risk-sharing arrangements between employees and employers

aufgekommen sind, hat sich der Fachausschuss für die Einreichung einer Stellungnahme beim *IFRS Interpretations Committee* entschieden, in der eine angemessene Klarstellung dieser Formulierung erbeten werden soll.

- 4 Vor diesem Hintergrund findet sich auf den Folgeseiten der Entwurf einer Stellungnahme des IFRS-FA an den IFRSIC.

Frage an den IFRS-FA

Stimmen Sie diesem Entwurf zu?



DRAFT

Mr Wayne Upton
Chairman of the
IFRS Interpretations Committee (IFRS IC)
30 Cannon Street
London EC4M 6XH
United Kingdom

Dear Wayne,

IAS 19 Employee Benefits – Accounting for contribution-based promises – Impact of the 2011 amendments to IAS 19

On behalf of the Accounting Standards Committee of Germany (ASCG) I am writing to comment on the IFRS Interpretations Committee's publication in the May 2012 *IFRIC Update* of the tentative agenda decision not to take onto the IFRSIC's agenda our request for an Interpretation of IAS 19 *Employee Benefits* with respect to providing guidance on the 'Accounting for contribution-based promises – Impact of the 2011 amendments to IAS 19'.

We agree with the IFRIC's decision not to take this item onto its agenda for the reasons set out in the tentative agenda decision. However, we believe the agenda decision should have additional wording to clarify the following terms used in the tentative agenda decision

- 'risk-sharing features' and
- 'elements of risk-sharing arrangements between employees and employers'.

In our view, it would be helpful if the agenda decision would include a reference to the wording of IAS 19.BC144 (2011). Specifically we refer to the statement in BC144 that (only) features that share the benefits of a surplus or the cost of a deficit between the entity and the plan participants included in defined benefit plans are risk-sharing features. It is our understanding of BC144 that this refers to situations in which additional payments must be made to eliminate a plan deficit or in which a surplus is distributed by the plan, and where these additional payments or the distributions are shared by employer and employee.



We understand that contribution based promises as we had described them in the *potential agenda item request* do not include risk-sharing features as described above. This is because all assets including the returns generated by them will be used to provide employee benefits so that no surplus can arise. Also, there is no risk-sharing in the context of a deficit. Put differently, there is no risk which will be shared between the employer and the plan participants.

In fact, contribution based promises are characterised by a variability relating to the contributions (payments) to be made into the plan on one hand and a variability relating to the amount of employee benefits to be received by plan participants on the other hand – however, the agenda decisions should make clear that these two types of variability do not constitute ‘risk-sharing features’.

If you would like further clarification of the issues set out in this letter, please do not hesitate to contact me.

With best regards,

Liesel Knorr
President